

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

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In the Matter of

WT Docket 98-143

1998 Biennial Review  
--Amendment of Part 97  
of the Commission's  
Amateur Service rules

RM-9148

RM-9150

RM-9196

To: Federal Communications Commission

**COMMENTS OF:**

**I: INTRODUCTION**

I, Frederick W. Bonavita II, file these comments on November 2, 1998, in the FCC's Notice of Proposed Rule Making, WT Docket No. 98-143.

As an Amateur Radio operator since December 1952, I have enjoyed the privileges extended by the Commission through a licensing program that met the needs of the hobby through the years and continues to do so. I currently hold Amateur Extra Class license with the call W5QJM.

The Commission is embarking on a major overhaul of the licensing program to meet what is perceived as the needs of the hobby as we know it today. While I disagree with some of the proposals under consideration and have no feeling about others, I would nonetheless like my limited comments to be considered in this undertaking.

In response to the questions I understand the Commission would like answered, I submit the following:

**II. Number of Amateur Service License Classes:**

Six classes of licenses are too many. Three would be a more realistic number. What they are called almost is irrelevant as long as existing operating privileges are transferred with the new name.

**III. How important is the Novice class?**

As such, the Novice class license is unimportant. What is important is that there be an entry-level license that will help newcomers join the ranks of the Amateur Service much as the Novice class helped me get my start more than 45 years ago. I sweated for weeks learning Morse Code to pass my 5 WPM test, but I did it on the first try. (By the way, that test was administered at the Commission examining post at 22<sup>nd</sup> and E Streets in a disused schoolhouse and where the State Department now stands, I think. I was scared to death.)

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#### **IV: What should be the disposition of the Novice Bands?**

Here is where I break ranks with many Amateur operators today. At the moment, I may operate in the Novice Bands as long as I observe the limits on power output and use Morse code. If the Novice class license is abolished by the Commission and is replaced by an entry-level license of whatever name, the use of frequencies where Novices may now operate should be reassigned to this entry-level license class with the same restrictions. Under no circumstances should the Commission reassign the Novice frequencies in the 80, 40, 15 and 10 meter bands and permit voice transmissions on those frequencies. Those frequencies should continue to be available for only those modes now permitted to be used there.

While I understand the Commission has not invited comment directly on the restructuring proposals offered by the American Radio Relay League, of which I am a member, please permit me this observation: When the ARRL Board of Directors adopted its position on the proposed overhaul by the Commission, it said two principles guided its thinking. They are "No present licensee should lose privileges, and present licensing standards should be maintained." While I have no quarrel with the latter, the former is undercut by proposals by the ARRL to reassign the Novice frequencies so voice transmissions may be used there. In short, voice transmissions should continue to be confined to those subbands where they are permitted today.

#### **V: Should the Technician Plus license be phased out?**

No comment.

#### **VI: Should Advanced class operators be permitted to be volunteer examiners for the General class?**

No comment.

#### **VII: Should RACES station licenses be phased out?**

No comment.

#### **VIII: How can the Amateur Auxiliary improve enforcement of the Amateur Service rules?**

There can be no doubt that strict, swift enforcement of the Commission's rules and regulations is sorely needed by our hobby today. I am not persuaded the so-called Amateur Auxiliary is the way to tackle this horrendous problem plaguing the Amateur frequencies. This smacks of vigilantes running over the countryside, creating more problems than they solve. I would rather see the Commission ask the Congress for more resources for enforcement, even if the Amateur Service has to pay for it through licensing fees. I would rather pay a fee than to see others continue to make a mockery of these regulations.

**IX: What changes would you make to the telegraphy examination requirements?**

None.

If, however, the Commission feels these requirements should be lessened, I favor keeping the 5 WPM entry-level Morse code test and reducing the levels for higher-class licenses but to not less than 15 WPM.

**X: Should the code speed be reduced to 5 WPM for everyone as a way to eliminate the need to grant waivers of the higher code speed requirements for the handicapped?**

See answer to IX above. In any event, the Commission must tighten the rules for those who claim a medical waiver to the code requirement for higher class licenses. This otherwise well-intentioned program has been severely abused by unscrupulous people who have taken advantage of it to escape legitimate testing.

**XI: What changes, if any, should be made to the written examinations?**

No comment.

**XII: Conclusions:**

The Commission is to be commended to this undertaking. The Amateur Service is in need of restructuring in many areas, but there are those I mentioned above where the Commission is better advised to keep hands off (as in reassigning frequencies now available to the Novice class license) or to take a firmer grip (as in enforcement).

As folks in Texas are fond of saying: "If it ain't broke, don't fix it."

Respectfully submitted:



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